

# UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PA 19406-1415

September 1, 2011

Mr. Michael J. Pacilio Senior Vice President, Exelon Generation Company, LLC President and Chief Nuclear Officer, Exelon Nuclear 4300 Winfield Rd. Warrenville, IL 60555

SUBJECT:

MID-CYCLE LETTER FOR LIMERICK GENERATING STATION

(05000352/2011006 and 05000353/2011006)

Dear Mr. Pacilio:

On August 9, 2011, the U.S. Nuclear Regulatory Commission (NRC) NRC completed its mid-cycle performance review of the Limerick Generating Station Units 1 and 2. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2010, through June 30, 2011. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. This performance review and enclosed inspection plan do not include security information. A separate letter will include the NRC's assessment of your performance in the Security Cornerstone and its security-related inspection plan.

The NRC determined the performance at Limerick Units 1 and 2 during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The enclosed inspection plan lists the inspections scheduled through December 31, 2012. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. In addition to the baseline inspection program, we plan to conduct Inspection Procedure (IP) 60855, "Operation of an ISFSI;" IP 71002, "Licensee Renewal Inspection;" and Temporary Instruction (TI) TI-177, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems (NRC Generic Letter 2008-01)." From July 1, 2010, to June 30, 2011, the NRC issued one severity level IV (SLIV) traditional enforcement non-cited violation associated with impeding the regulatory process (ML103570125). Therefore, the NRC also plans to conduct IP 92702 to follow-up on this violation. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes.

<sup>&</sup>lt;sup>1</sup> Designation in parenthesis refers to an ADAMS accession number. Documents referenced in this letter are publicly available using the accession number in ADAMS.

In the days following the Fukushima Daiichi nuclear accident in Japan, the Commission directed the staff to establish a senior-level agency task force to conduct a methodical and systematic review of the NRC's processes and regulations to determine whether the agency should make additional improvements to its regulatory system. The NRC has since completed Temporary Instruction (TI) 183, "Follow-up to Fukushima Daiichi Nuclear Station Fuel Damage Event," and TI-184, "Availability and Readiness Inspection of Severe Accident Management Guidelines (SAMGs)," at your facility. Results of these inspections can be found here: <a href="http://www.nrc.gov/japan/japan-activities.html">http://www.nrc.gov/japan/japan-activities.html</a>. Additionally, on May 11, 2011, the agency issued NRC Bulletin 2011-01, "Mitigating Strategies," to confirm compliance with Order EA-02-026, subsequently imposed license conditions, and 10 CFR 50.54(hh)(2), and to determine the status of licensee mitigating strategies programs. On July 12, 2011, the NRC's Task Force made its recommendations to the Commission in its report, "Recommendations for Enhancing Reactor Safety in the 21st Century: The Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident." The NRC is currently reviewing the Task Force's recommendations to determine what additional actions may be warranted.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

Please contact me at (610) 337-5120 with any questions you have regarding this letter.

Sincerely,

Paul G. Krohn, Chief

Division of Reactor Projects

Projects Branch 4

Docket Nos. 50-352, 50-353 License Nos. NPF-39, NPF-85

Enclosure: Inspection Plan

cc w/encl: Distribution via ListServ

In the days following the Fukushima Daiichi nuclear accident in Japan, the Commission directed the staff to establish a senior-level agency task force to conduct a methodical and systematic review of the NRC's processes and regulations to determine whether the agency should make additional improvements to its regulatory system. The NRC has since completed Temporary Instruction (TI) 183, "Follow-up to Fukushima Daiichi Nuclear Station Fuel Damage Event," and TI-184, "Availability and Readiness Inspection of Severe Accident Management Guidelines (SAMGs)," at your facility. Results of these inspections can be found here: <a href="http://www.nrc.gov/japan/japan-activities.html">http://www.nrc.gov/japan/japan-activities.html</a>. Additionally, on May 11, 2011, the agency issued NRC Bulletin 2011-01, "Mitigating Strategies," to confirm compliance with Order EA-02-026, subsequently imposed license conditions, and 10 CFR 50.54(hh)(2), and to determine the status of licensee mitigating strategies programs. On July 12, 2011, the NRC's Task Force made its recommendations to the Commission in its report, "Recommendations for Enhancing Reactor Safety in the 21st Century: The Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident." The NRC is currently reviewing the Task Force's recommendations to determine what additional actions may be warranted.

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Sincerely, /RA/

Paul G. Krohn, Chief Division of Reactor Projects Projects Branch 4

Docket Nos. 50-352, 50-353 License Nos. NPF-39, NPF-85

Enclosure: Inspection Plan

cc w/encl: Distribution via ListServ

Distribution: See attached page

SUNSI REVIEW COMPLETE: AAR (Reviewer's Initials) ML112411354

DOCUMENT NAME: S:\ROP-12 MID-CYCLE REVIEW/BRANCH 4\LIM\LIMERICK MID-CYCLE ASSESSMENT LETTER.DOCX

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NAME	EDiPaolo/ AAR for*	AARosebrook/ AAR*	PGKrohn/ PGK
DATE	8/15/11	08/15/11	08/18/11

\*See Previous Concurrence OFFICIAL RECORD COPY

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#### Limerick

## Inspection / Activity Plan

### 07/01/2011 - 12/31/2012

Unit	Planned Dates				No. of Staff	
Number	Start	End	Inspection A	ctivity	Title	on Site
	en Ethiologia de Japan III i i Pisa de Gi		60855.1	- ISFSI C	OPERATION INSPECTION	1
1, 2	07/18/2011	07/23/2011	IP 60855.1		Operation of an Independent Spent Fuel Storage Installation at Operating Plants	
			TI-177	- MANA	GING GAS ACCUMULATION IN ECCS	3
1, 2	08/08/2011	08/12/2011	IP 2515/177		Managing Gas Accumulation In Emergency Core Cooling, Decay Heat Removal & Containment Spray System	
			92702	- FOLLO	DW-UP FOR UFSAR SLIV NCV	1
1, 2	09/12/2011	09/14/2011	IP 92702		Followup On Corrective Actions For Violations And Deviations	
			7111107T	- TRIENI	NIAL HEAT SINK	1
1, 2	09/19/2011	09/23/2011	IP 7111107T	-	Heat Sink Performance	
			71124	- REMP		1
1, 2	09/26/2011	09/30/2011	IP 71124.07		Radiological Environmental Monitoring Program	
			7111117	- PERM	ANENT PLANT MODIFICATIONS	3
1, 2	10/17/2011	10/21/2011	IP 7111117T	-	Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications	
1, 2	10/31/2011	11/04/2011	IP 7111117T	-	Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications	
			71124	- EFFLU	IENTS	1
1, 2	10/31/2011	11/04/2011	IP 71124.06		Radioactive Gaseous and Liquid Effluent Treatment	
			EP EX	- EP EX	ERCISE EVALUATION	5
1, 2	11/14/2011	11/18/2011	IP 7111401		Exercise Evaluation	
1, 2	11/14/2011	11/18/2011	IP 7111404		Emergency Action Level and Emergency Plan Changes	
1, 2	11/14/2011	11/18/2011	IP 71151-EP	<b>2</b> 01	Drill/Exercise Performance	
1, 2	11/14/2011	11/18/2011	IP 71151-EP	02	ERO Drill Participation	
1, 2	11/14/2011	11/18/2011	IP 71151-EF	203	Alert & Notification System	
			71124	- OCC R	RAD SAFETY - INSTRUMENTS	1
1, 2	11/14/2011	11/18/2011	IP 71124.05		Radiation Monitoring Instrumentation	
			71124	- OCC R	RAD SAFETY	1
1, 2	01/09/2012	01/13/2012	IP 71124.01		Radiological Hazard Assessment and Exposure Controls	
1, 2	01/09/2012	01/13/2012	IP 71124.02		Occupational ALARA Planning and Controls	
1, 2	01/09/2012	01/13/2012	IP 71124.04		Occupational Dose Assessment	
			7111108G	- INSER	EVICE INSPECTION	1
1	02/27/2012	03/02/2012	IP 71111080	3	Inservice Inspection Activities - BWR	
			71124	- ACCE	SS/ALARA/AIRBORNE RADIOACTIVITY	1
1,2	03/05/2012	03/09/2012	IP 71124.01		Radiological Hazard Assessment and Exposure Controls	
1, 2	03/05/2012	03/09/2012	IP 71124.02		Occupational ALARA Planning and Controls	
1, 2	03/05/2012	03/09/2012	IP 71124.03		In-Plant Airborne Radioactivity Control and Mitigation	

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.

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## Limerick Inspection / Activity Plan

07/01/2011 - 12/31/2012

Unit Number	Planne Start	d Dates End	Inspection A	ctivity #	Title	No. of Staff on Site
Bunnesan hadradis			71002		PECTION	4
1, 2	06/04/2012	06/08/2012	IP 71002	- LIX IIVO	License Renewal Inspection	·
1, 2	06/18/2012	06/22/2012	IP 71002		License Renewal Inspection	
1, 2	00/10/2012	0012212012	10/08EXM	- LIMERI	ICK INITIAL EXAM	4
1	09/10/2012	09/14/2012	U01858	- 211412131	FY13-LIMERICK INITIAL OPERATOR LICENSING EXAM	·
1	10/08/2012	10/19/2012	U01858		FY13-LIMERICK INITIAL OPERATOR LICENSING EXAM	
•	10/00/2012	10/19/2012	71124	- RW	THE EMERICA MANAGE OF ELECTRONICS ESSENTIAL ES	1
4.0	00/44/2042	06/15/2012	IP 71124.08		Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	'
1, 2	06/11/2012	06/13/2012			Tradibactive Solid Waste Frocessing and Tradibactive Material Franching, Storage, and Transportation	6
			7111121	- CDBI	Our LD 1 D continue the	0
1, 2	08/27/2012	08/31/2012	IP 7111121		Component Design Bases Inspection	
1, 2	09/10/2012	09/14/2012	IP 7111121		Component Design Bases Inspection	
1, 2	09/24/2012	09/28/2012	IP 7111121		Component Design Bases Inspection	
			7111111B	- LIMER	ICK ON-SITE RQL INSP W/ P/F RESULTS	2
1, 2	10/29/2012	11/02/2012	IP 7111111E	3	Licensed Operator Requalification Program	
			71152B	- PI&R		4
1, 2	10/22/2012	10/26/2012	IP 71152B		Problem Identification and Resolution	
1, 2	11/05/2012	11/09/2012	IP 71152B		Problem Identification and Resolution	
			<b>EP PROGR</b>	- EP PR	OGRAM INSPECTION	1
1, 2	12/03/2012	12/07/2012	IP 7111402		Alert and Notification System Testing	
1, 2	12/03/2012	12/07/2012	IP 7111403		Emergency Preparedness Organization Staffing and Augmentation System	
1, 2	12/03/2012	12/07/2012	IP 7111404		Emergency Action Level and Emergency Plan Changes	•
1, 2	12/03/2012	12/07/2012	IP 7111405		Correction of Emergency Preparedness Weaknesses and Deficiencies	
			71124	- OCC R	AD SAFETY	1
1, 2	12/10/2012	12/14/2012	IP 71124.01		Radiological Hazard Assessment and Exposure Controls	